

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
3 RACHEL M. KORENBLAT
Assistant Federal Public Defender
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
6 (702) 388-6261/Fax

7 Attorney for Ray Anderson

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**
11

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 RAY ANDERSON,

16 Defendant.
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Case No. 2:15-cr-200-KJD-PAL

**MOTION TO CONTINUE THE
DEADLINE FOR DEFENDANT'S REPLY
TO THE GOVERNMENT'S RESPONSE**

(FIRST REQUEST TO CONTINUE
DEFENDANT'S REPLY DEADLINE)

19 Comes now the defendant, RAY ANDERSON, by and through his counsel of record, RACHEL
20 KORENBLAT, Assistant Federal Public Defender, and files this Motion to Continue the Deadline for
21 Defendant's Reply to the Government's Response until March 15, 2016.

22 This motion is supported by the following Points and Authorities, and all pleadings and papers
23 filed herein.
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DATED this 3rd day of March, 2016.

RENE VALLADARES
Federal Public Defender

By: /s/ Rachel Korenblat
RACHEL KORENBLAT,
Assistant Federal Public Defender
Attorney for Ray Anderson

MEMORANDUM OF POINTS AND AUTHORITIES

On January 13, 2016, Mr. Anderson filed a suppression motion. (CR # 25.) On January 29, 2016, the government filed a stipulation to extend the government's response to the motion by two weeks. (CR # 28.) The Court granted the stipulation, ordering the government's response due by February 16, 2016. (CR # 30.) On February 17, 2016, one day after that deadline, the government filed a motion to continue its response by another two weeks. (CR # 32.) The Court granted the government's motion, ordering the government's response due by March 1, 2016. (CR # 33.)

The government filed its response on Tuesday, March 1, 2016. (CR # 34.) According to Pacer, Mr. Anderson's reply is due by Monday, March 7, 2016, though it should be due according to Local Rule 7-2 by March 14, 2016. (*Id.*; *see also* LR 7-2 ("Unless otherwise ordered by the court, reply points and authorities shall be filed and served by the moving party eleven (11) days after service of the response.")) Defense counsel will be unable to travel to meet with Mr. Anderson, who is incarcerated in Pahrump, Nevada, to discuss the government's response and our reply by Pacer's Monday deadline. In order to allow defense counsel time to confer with Mr. Anderson, and thoroughly draft a reply, the defense requests a one-week and one-day extension of the deadline by which the reply is due according to Pacer. Thus, Mr. Anderson respectfully requests the Court order his reply due by March 15, 2016.

DATED this 3rd day of March, 2016.

Respectfully Submitted,

RENE VALLADARES
Federal Public Defender

By: /s/ Rachel Korenblat
RACHEL KORENBLAT,
Assistant Federal Public Defender
Attorney for Ray Anderson

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.
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8 RAY ANDERSON,

9 Defendant.
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Case No. 2:15-cr-200-KJD-PAL

ORDER ON MOTION TO CONTINUE
THE DEADLINE FOR DEFENDANT'S
REPLY TO THE GOVERNMENT'S
RESPONSE

11 Based on the Motion to Continue the Deadline for Defendant's Reply to the Government's
12 Response and good cause appearing therefore,

13 IT IS HEREBY ORDERED ADJUDGED AND DECREED that the Motion is hereby
14 GRANTED, and the Defendant's Reply to the Government's Response to his Motion to Suppress is due
15 by March 15, 2016.

16 DATED this 4th day of March, 2016.

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18 UNITED STATES MAGISTRATE JUDGE
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1 **CERTIFICATE OF ELECTRONIC SERVICE**

2 The undersigned hereby certifies that he is an employee of the Federal Public Defender for the
3 District of Nevada and is a person of such age and discretion as to be competent to serve papers.

4 That on March 3, 2016, she served an electronic copy of the above and foregoing **MOTION**
5 **TO CONTINUE THE DEADLINE FOR DEFENDANT'S REPLY TO THE GOVERNMENT'S**
6 **RESPONSE (FIRST REQUEST TO CONTINUE DEFENDANT'S REPLY DEADLINE)** by
7 electronic service (ECF) to the person named below:
8

9 DANIEL BOGDEN
10 United States Attorney
11 PHILLIP N. SMITH JR.
12 333 Las Vegas Blvd. So. 5th Floor
13 Las Vegas, NV 89101

14 */s/ Christopher Vergari*
15 Employee of the Federal Public Defender
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